

Remarks

Claims 21-40 are pending in this application, with Claims 21, 33 and 39 being independent. Claims 33-39 are withdrawn from consideration. Reconsideration and allowance of Applicant's claims are respectfully requested in view of the following remarks.

Specification

The specification is amended to correct minor typographical errors. No new matter is added.

Rejection under 35 U.S.C. § 102

Claims 21-24, 26-32 and 40 are rejected under 35 U.S.C. §102(b) as being anticipated by Martino et al. ("Martino," U.S. Patent No. 5,276,314).

Independent Claim 21 is directed to a method of inputting a password for authentication in a user authentication system. The method comprises, *inter alia*, "displaying a matching board comprising a certain cell and at least one other cell and a reference board comprising a first cell and at least one other cell on a user interface; and receiving the password from a user matching a symbol within the certain cell of the matching board with a password symbol within the first cell of the reference board, to authenticate the received password." Martino fails to disclose these features.

Martino is directed to an identity verification system. In this system, an array of symbols is presented to a user and the user manipulates several symbols into a predetermined state or position. The user manipulates the symbols by shifting each symbol within a column or row of the array, such that each symbol in a column or row moves one position vertically or horizontally within the column or row. The position of each symbol that is associated with a password or PIN is referred to as the KEY STATE. This KEY STATE is compared to a user's predetermined KEY STATE to determine if the user may access the secure system. That is, the position of a predetermined set of symbols is compared to the position of the symbols in a predetermined KEY STATE set by the user.

In rejecting Claim 21, the Office Action identifies the second row of the array (for example

D3, A1, D2, B0 in FIG. 3) as corresponding to the claimed matching board, and the third row of the array (for example C1, D0, A3, C2 in FIG. 3) as corresponding to the claimed reference board. The Office Action also identifies the cells having symbols A1 and D2 as corresponding to the claimed certain cell and at least one other cell of the matching board, and the cells having symbols C2 and D0 as corresponding to the claimed first cell and at least one other cell of the reference board.

As noted above, the method of Claim 21 includes "receiving the password from a user matching a symbol within the certain cell of the matching board with a password symbol within the first cell of the reference board, to authenticate the received password." The Office Action relies on Martino's disclosure in FIG. 2 at 232 and 234, column 4, lines 53-56, and column 5, lines 4-19 in an effort to show these features. However, Martino does not disclose these claimed features in the cited portions or elsewhere.

In Martino, the symbols in second row, identified as the matching board, may be shifted left or right through user manipulation. The position of a predetermined symbol, for example "A1," is compared to the predetermined user's KEY STATE. That is, the position of the symbols forming the displayed ARRAY STATE are compared to the user's predetermined KEY STATE to check if the symbols which are part of the password or PIN are properly positioned to allow access. Thus, to the extent a comparison of two symbols may be considered "matching," the symbol A1 is only compared to the position of symbol A1 in the user's predetermined KEY STATE, which is not displayed. The symbol A1, for example, is not compared or matched to any symbol in the third row of the array. That is, the only "matching" Martino is concerned with is the position of a symbol on the displayed array to the position of a corresponding symbol in the user's predetermined KEY STATE which is not displayed. As such, Martino does not disclose a password received from a user "matching a symbol within the certain cell of the matching board with a password symbol within the first cell of the reference board," as claimed.

Martino's disclosure at the cited passages further supports Applicant's position that these features, as claimed, are not disclosed. Steps 232 and 234 in FIG. 2 are discussed at column 5, lines 4-19. Here, Martino provides that "[i]n response to this signal, in step 232 the system compares the user's KEY STATE definition (retrieved in step 206) with the displayed ARRAY STATE. If the user's KEY STATE is found correctly in the FINAL ARRAY STATE (the displayed ARRAY STATE at the time the user signals that he is satisfied), in step 234 the system provides

the user access to the controlled resource." That is, step 232 refers to a comparison between the displayed array state and the user's predetermined KEY STATE which is not displayed. There is no indication that the position of a symbol, e.g., A1, is matched to any symbol in any other row of the displayed array, let alone a symbol in the third row of the displayed array, which the Office Action identifies as the reference board. Column 4, lines 53-56, also cited in the Office Action, simply refers to the manipulation symbols or cells in the ARRAY STATE, but does not disclose the "matching" as claimed.

Claim 21 also states "such that the matching board moves to allow the certain cell of the matching board to correspond with the first cell of the reference board in response to the certain cell and the first cell not already being in correspondence with one another, wherein positions of the first cell and the at least one other cell of the reference board are altered and positions of the certain cell and the at least one other cell of the matching board are not altered in response to the certain cell and the first cell not already being in correspondence with one another." Martino fails to disclose these features.

To the extent the second row of the array (for example D3, A1, D2, B0 in FIG. 3) may be considered a matching board, the second row of the array does not move. Rather, the cells or symbols, i.e., D3, A1, D2, B0, move within the second row. However, the second row, itself, remains fixed in the array. That is, to the extent symbols D3, A1, D2 and B0 may constitute a matching board, the symbols simply move within the board while the board remains stationary. Thus, even if it could be said that the certain cell (identified as A1) of the second row was moved to correspond to the first cell (identified as C2) of the third row, it is only the cell or symbol itself that is moved, not the row, or matching board, as suggested by the Office Action. Thus, Martino does not disclose the matching board to be moved to allow the certain cell of the matching board to correspond with the first cell of the reference board, as claimed.

Because Martino fails to disclose each feature as recited in the claims, this anticipatory rejection is not supported. Accordingly, withdrawal of this rejection and allowance of Claim 21 are respectfully requested.

Claims 22-24, 26-32 and 40 ultimately depend from Claim 21 and include all of the features thereof. Applicant respectfully submits that Claim 21 is in condition for allowance for at least the

reasons detailed above. Thus, based at least upon their dependency from Claim 21, it is respectfully submitted that these dependent claims are in condition for allowance as well.

In addition, these claims also recite features not shown by Martino. For example, Claim 28 recites "wherein one of the matching board and the reference board is moved with respect to the other so as to overlap to match the cells of the matching board with the cells of the reference board." The Office Action takes the position that Martino discloses such a feature at column 5, lines 4-19 and column 6, lines 3-10. However, the passage at column 5 only addresses how user's KEY STATE definition is compared to the displayed ARRAY STATE. To the extent the second row in the array of Martino may correspond to a matching board, and the third row may correspond to a reference board, there is no disclosure that one row is moved to with respect to the other such that the rows overlap.

The passage at column 6 also fails to disclose this feature. Here, Martino simply provides that other transformations, for example, color, shape or orientation may be used instead of shifting. However, there is no disclosure that cells of one row may overlap cell of another row. Thus, there is no disclosure that one of the matching board and the reference board is moved with respect to the other so as to overlap to match the cells of the matching board with the cells of the reference board, as claimed.

Rejection under 35 U.S.C. § 103

Claim 25 is rejected under 35 USC §103(a) as being unpatentable over Martino in view of Pimpo (U.S. Patent No. 6,021,653). Applicant respectfully submits that Pimpo does not remedy the deficiencies of Martino. Therefore, it is respectfully submitted that in addition to features recited therein, based on its dependency from independent Claim 21, which is allowable, Claim 25 is also allowable. Withdrawal of this rejection and allowance of this claim are respectfully requested.

Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this

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application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

Respectfully submitted,

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